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Caleb R. Trotter (Application for Pro Hac Vice pending)
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Attorneys for Plaintiff Do No Harm

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION**

DO NO HARM,

Plaintiff,

v.

GREGORY GIANFORTE, in his
official capacity as Governor of
the State of Montana,

Defendant.

Civil Action No.: 6:24-cv-00024-
BMM-KLD

**AFFIDAVIT IN SUPPORT
OF MOTION FOR CALEB R.
TROTTER TO APPEAR PRO
HAC VICE**

I, Caleb R. Trotter, pursuant to Rule 83.1(d)(4) of the United States District Court for the District of Montana, being duly sworn on oath, state as follows:

A. I reside in the State of California and am an attorney with Pacific Legal Foundation, located at 555 Capitol Mall, Suite 1290 Sacramento, CA 95814; my telephone number is (916) 419-7111; my fax number is (916) 419-7747; and my email address is ctrotter@pacificlegal.org.

B. The appropriate admission fee was paid with filing of the Motion to Appear Pro Hac Vice.

C. I am proficient in electronic filing in the United States District Court for the Eastern District of California.

D. I am admitted to practice in the bars of the State of California (Cal. Bar No. 305195), admitted on December 1, 2015; the United States District Court for the Eastern District of California, admitted on November 28, 2017; the United States District Court for the Central District of California, admitted on November 20, 2019; the United States District Court for the Northern District of California, admitted on June 8, 2023; the United States Court of Appeals for the Second

Circuit, admitted on April 30, 2021; the United States Court of Appeals for the Fifth Circuit, admitted on December 17, 2020; the United States Court of Appeals for the Eighth Circuit, admitted on October 16, 2018; the United States Court of Appeals for the Ninth Circuit, admitted on September 9, 2016; the United States Court of Appeals for the Tenth Circuit, admitted on May 7, 2019; the United States Court of Appeals for the Eleventh Circuit, admitted on March 22, 2016; the Supreme Court of the United States, admitted on January 14, 2019. None of my admissions have been terminated.

E. I am in good standing and eligible to practice in these courts.

F. I am not currently suspended or disbarred in any other court.

G. I have never been held in contempt or otherwise disciplined by any court for disobedience to its rules or orders, or sanctioned under Fed.

R. Civ. P. 11 or 37(b) or their state equivalent.

H. I have not concurrently or within the two years preceding the date of this Motion to Appear Pro Hac Vice made any *pro hac vice* application to this court.

I. I understand that *pro hac vice* admission in this court is personal to me only and is not admission of my law firm and that I will be held fully accountable for the conduct of the litigation in this court.

J. I have complied with Montana Rules of Professional Conduct 8.5. Attached as Exhibit A is my agreement to be bound by the Montana Rules of Professional Conduct 8.5.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED: March 28, 2024.

Respectfully submitted,



Caleb R. Trotter

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EXHIBIT A

I, Caleb R. Trotter, hereby certify in writing and under oath to this court that, except as to Rules 6.1–6.4 of the Montana Rules of Professional Conduct (“Rules”), I will be bound by these Rules in my practice of law in Montana and will be subject to the disciplinary authority of Montana.


A copy of this certification will be mailed, contemporaneously, to the business office of the State Bar of Montana in Helena, Montana.



Caleb R. Trotter

Subscribed and sworn to (or affirmed) before me on this 28th day of March, 2024, Caleb R. Trotter, proved to me on the basis of satisfactory evidence to be the person who appeared before me.





Notary Public
Kiren Kamni Mathews
2362285
Sacramento, CA